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FOCAL ARTICLE

Identified Employee Surveys: Potential Promise, Perils, and Professional Practice Guidelines

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Abstract

Over the years, employee opinion surveys have evolved in their use and how they are conducted. A major advancement has been the use of linkage analyses, whereby employee attitudes at a unit level are statistically related to other important organizational outcomes. A more recent development has been linkage analyses at the individual level and over time. In order to carry out these types of analyses, ''identified surveys'' must be used—surveys that *retain identifying information* on each survey respondent in order to link with other individual-level variables over time. The purpose of this article is to open up a discussion on identified surveys, describe under what circumstances they may be uniquely beneficial, and highlight potential concerns with them. We close with proposed guidelines for professional practice and recommend that our profession have a point of view on identified surveys for ourselves and to advise others.

Over the past 50 years, employee opinion surveys have become a regular part of organizational life for many employees (Kraut & Saari, 1999). From an organization's perspective, employee surveys provide an opportunity to diagnose critical aspects of organizational functioning. From an employee's perspective, surveys provide an opportunity to provide candid feedback about the organization, express views about the work environment, and impact change in the organization. Given the mutually beneficial nature of employee surveys, it is no surprise that they have grown from being used primarily in large organizations on a limited number of human resources topics, to being widely used by all types of organizations on an ever-expanding list of topics (Church & Waclawski, 1998; Kraut, 2006).

As employee surveys have expanded and evolved in their use, the practice of surveying has also evolved. One area that exemplifies these changes is the impact of technology on survey practices (Kraut & Saari, 1999). Online surveys were introduced in the 1980s, and it is now common practice for employee surveys to be administered via computer and for survey results to be provided online. With the transition from paper surveys to computer-based surveys, a major focus for practitioners was building employee trust in the new method and ensuring that employees understood that computer-based

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surveys were truly anonymous (Fenlason & Suckow-Zimberg, 2006).

Another change in employee surveys has been the increased realization that employee attitudes—as measured by employee surveys—can be statistically related to other important organizational data (Harter, Schmidt, & Hayes, 2002; Rucci, Kirn, & Quinn, 1998; Schneider, Ashworth, Higgs, & Carr, 1996; Schneider & Bowen, 1985; Wiley & Campbell, 2006). This so-called linkage research has been carried out extensively over the past several decades. It has demonstrated the value of using aggregated employee survey data at the work group, branch, or even organization level to derive insights about how employee attitudes relate to a variety of organizational measures (Schneider, Macey, Lee, & Young, 2009).

Technology developments have enabled another linkage analysis approach involving the collection and retention of *individual* identifying information as part of an employee's survey responses. This type of linkage research is conducted at the *individual level* with other individual-level HR-type data. These types of employee opinion surveys—ones that collect and *retain* identifying information on each respondent—do not have a formal name. In our 2010 SIOP panel (Saari et al., 2010), we referred to them as *identified surveys*, so we will continue to use that term in this article.

Identified surveys involve collecting and *retaining* a unique identifier on each employee taking a survey. This is done so that an employee's survey data can then be linked to other data on the individual, such as his or her current and future performance ratings, promotions, attendance over time, future turnover, and other surveys he or she will take. Identified surveys are not anonymous because they collect and keep identifying information.

Temporarily-identified surveys identify a person only during the time of survey administration or for a limited time period after the survey is completed. Reasons for temporary identification include verifying that someone is authorized to take a survey (e.g., for a sample survey), ensuring someone takes a survey only once, allowing a respondent to save and return to a partially completed survey, or adding a person's demographic or organizational unit information from company records to his or her survey results. After the temporary period of identification, a temporarily identified survey becomes anonymous.[1]

Nonidentified surveys do not include individual identifiers, and demographic and other information is collected within the survey itself. In the past, this was the only way employee opinion surveys were conducted. This method continues to be successfully used by many organizations that carry out employee opinion surveys and provides valuable research and insights.

The focus of this article is on identified surveys—employee opinion surveys that collect and *retain* identifying information on each survey respondent. Despite a large literature on employee opinion surveys (e.g., Kraut, 2006), there is little advice and research about the actual effects of identified employee surveys on areas such as perceived anonymity, likelihood of responding, possible effects on ratings, as well the professional and ethical issues that arise. This lack of advice and research is surprising given that other areas of employee opinion surveys have received considerable attention (e.g., nonresponse, impact of online formats, survey item design), and this topic may be equally, if not more, important.

In addition, the use of identified employee surveys raises potential concerns about employee privacy and personal data. These include appropriate linking and aggregation of data, the type of data that is appropriate to link (e.g., attendance, employee leaves, selection tests results,

1. If an employee has a unique set of demographics (e.g., female, vice president, engineering, and Native American) and someone with access to the survey data intentionally or unintentionally crosses these demographics, such an employee could potentially be identified even with an anonymous survey.

external credit reports obtained at hiring, disciplinary actions, health-related information), and if there are circumstances that could ever warrant or legally require revealing a person's identity. Underlying all of these concerns is employee trust in current and future surveys. Although the importance of trust in the system and process is explicitly recognized in other areas of organizational practice, such as performance management (e.g., Pulakos, 2009), there is far less written on issues of trust when it comes to employee opinion surveys. In the area of 360s, where the target individual is identified but the raters are not (other than the superior), the issue of trust is addressed with ethical cases to guide practice (Lowman, 2006).

Other fields have wrestled with and conducted research on topics related to identified surveys. For example, in medicine and public health, research has been conducted on the effects of varying survey anonymity on data quality (e.g., Bowling, 2005; Durant, Carey, & Schroder, 2002), and the medical field must now address the appropriate handling of patient information as a result of HIPAA legislation. Research in social psychology has addressed related psychological factors, such as research on deindividuation and impression management. However, little of this work has informed employee opinion survey practice. Thus, there is a need for practice and science-based information about the appropriate use of identified surveys, the potential impact of identified surveys on employee reactions and data quality, and the additional privacy, legal, and ethical issues that may arise.

When Are Identified Surveys Uniquely Beneficial?

Linking employee opinion survey data to a variety of other human resource and organizational data and conducting analyses to test research questions can lead to useful, data-based insights (Harter et al., 2002; Schneider & Bowen, 1985; Wiley & Campbell, 2006). With *identified surveys*, the focus is specifically on individual-level behavior, attitudes, or decisions, which is consistent with how human resources professionals collect and maintain employee data. As well, these types of analyses may be seen as supportive of a recent trend in human resources for ''predictive analytics'' and employee life-cycle research, both of which can provide evidence to support human resources decisions and recommendations (Davenport, Harris, & Morison, 2010).

However, when are identified surveys necessary to achieve these benefits, and when would nonidentified or temporarily identified surveys work equally as well? That is, when are identified surveys uniquely beneficial? Given potential issues with identified employee opinion surveys, we believe that it is important to use identified surveys only when the research questions of interest to the organization dictate it. When the questions don't require an identified survey, we would argue that alternatives such as nonidentified and temporarily identified surveys should be used.

The types of research questions that require or do not require an identified survey can be understood along two dimensions: *level of analysis* and *time span*. Level of analysis focuses on whether employee-level or unit-level (aggregated) data is required for a question of interest. Time span focuses on the length of time required by a particular question. We examine these two dimensions in more detail below and demonstrate that there is only one condition that calls for identified employee surveys.

Employee-Level Data, Short Time Span

In some cases, the questions of interest focus on the attitudes, behaviors, or decisions of individual employees. These research questions might examine how individual attitudes relate to performance ratings, attendance, individual sales, or individually measured counterproductive work

behaviors. These types of research questions are typically a single point in time or use slightly time-lagged data (e.g., mid-year survey data being related to end of year sales performance). In either case, the data come from a limited span in time and the time frame for which identification is needed is short. For employee-level data, short time span analyses, nonidentified or temporarily identified surveys are sufficient. Although identified surveys could be used for these purposes, they are not needed and we do not recommend them for this use.

Unit-Level Data, Short Time Span

Many of the individual-level questions described above can also be tested at the group level of analysis (Cascio & Boudreau, 2008). In addition, research questions relating employee attitudes to business outcome measures generally can only be conducted at a unit level. Unit-level, short time span research questions might examine how unit-level satisfaction relates to unit-level turnover, how unit-level safety attitudes relate to unit-level safety outcomes, how unit-level climate relates to unit revenue, and how unit-level engagement relates to customer satisfaction and service quality measures. Many of these outcome variables, such as revenue, quality, and customer measures, are business measures that are only captured at some type of unit in organizations. In addition, it has been proposed (e.g., Harter & Schmidt, 2006; James, 1982; Ostroff, 1992) that aggregation of data at the unit-level is preferable for some variables for conceptual reasons (e.g., work unit climate is conceptually at an aggregate). For unit-level data, short time span analyses, the data come from a limited span in time and the time span needed for which identification is short. Therefore, for these types of research questions, a nonidentified survey (asking for unit information in the survey) or a temporarily identified survey is sufficient. Although identified surveys could be used for these purposes, they are not needed and we do not recommend them for this use.

Employee-Level Data, Long Time Span

If the questions of interest are at the individual level and require knowing when things happen in addition to what happens (Mitchell & James, 2001), then individual-level longitudinal research is necessary. These research questions might examine how employee attitudes at organizational entry relate to when an employee separates from the organization, employee engagement over the employment life cycle, or how early career mentoring relates to attitudes over time. The research question may involve examining individual-level attitude and behavior relationships for long time lags (e.g., attitudes in Year 1 predicting performance in Years 2, 3, or longer) and/or over long time periods (e.g., examining the individual relationships for the same group of employees in multiple years). Thus, when the questions of interest require examining *individual-level* attitudes, behaviors or decisions *over time*, identified surveys are needed. Nonidentified or temporarily identified surveys will not work unless the question of interest can be examined by aggregating to the unit level. As we note later in this article, there are a number of recommendations for protecting and using data for these types of questions that require careful consideration.

Unit-Level Data, Long Time Span

Unit-level analyses, including analyses over time, have been shown to be viable and valuable for organizational research (e.g., Ployhart, Weekley, & Ramsey, 2009). Examples of unit-level, longitudinal research questions include how unit-level climate relates to long-term unit innovations, how unit-level leadership relates to unit performance over time, how unit-level engagement predicts customer retention over time, or how unit-level job satisfaction relates to unit-level sales over time. For these types of research questions, a nonidentified survey (asking for unit information in the survey) or a temporarily identified survey is sufficient. Although identified surveys could be used for these purposes, they

are not needed and we do not recommend them for this use.

In summary, identified employee surveys (that retain identifying information about each employee) are uniquely beneficial for individual-level longitudinal research questions. For limited time span individual-level, limited time span unit-level, and longitudinal unit-level analyses, identified surveys are not needed.

Do Identified Surveys Impact Employee Perceptions and Response Behavior?

One of the primary concerns with identified employee opinion surveys is that they remove anonymity and may impact response behavior (Rogelberg, Spitzmüller, Little, & Reeve, 2006; Stanton, 1998). These are many of the same concerns that were originally raised with online surveying more generally (see Stanton, 1998). Although there is much research on the impact of online surveys, there is much less research on the impact of the *level of identification* on employee perceptions and response behavior. This issue has received much more attention in other fields, such as market research (e.g., Graeff & Harmon, 2002; Heerwegh, Vanhove, Matthijs, & Loosveldt, 2005) and the medical profession (e.g., Durant et al., 2002). In this section, we briefly summarize the relevant research, identify areas where there are knowledge gaps, and point to related research that may serve as a basis for understanding the impact of identified surveys on employee perceptions and behavior.

Perceptions of Privacy and Anonymity

Data privacy and respondent anonymity have been longstanding concerns of survey practitioners and survey respondents (Dunnette & Heneman, 1956; Fenlason & Suckow-Zimberg, 2006; Kraut & Saari, 1999). Concerns center on the perception that personal information can be identified, it could be disclosed, and there may be consequences for that disclosure (Tourangeau & Yan, 2007). These concerns are widely observed in the general public (e.g., Fogel & Nehmad, 2009; Graeff & Harmon, 2002; Singer, Mathiowetz, & Couper, 1993; Singer, Van Hoewyk, & Neugebauer, 2003) and have also been shown to exist with younger generations despite the popular belief that it is less of an issue (Madden & Smith, 2010). These concerns appear to be heightened in the context of online surveys (Cho & LaRose, 1999) and especially for employee opinion surveys (Rogelberg, 2006; Thompson & Surface, 2007). Cho and LaRose (1999) even argue that the privacy is the primary concern about completing surveys online. Recent longitudinal studies suggest that privacy concerns have been increasing over time (Antón, Earp, & Young, 2010).

To address employee privacy concerns, many companies use a professional survey vendor for their surveys, with the vendor providing assurances of privacy and professional practices. However, even under these conditions, where the employee survey data sit outside the company with a professional organization, employees may still be concerned about openly sharing their views on an identified survey on sensitive topics such as manager effectiveness and intention to stay at the company, knowing that their data could be ultimately identified to them. Research from other areas of psychology suggests that assurances of data confidentiality may not reduce concerns about data privacy (Tourangeau & Yan, 2007). However, little research has examined how the use of third-party vendors and other survey design or implementation features of identified surveys impact employee perceptions of privacy. It is clear that the use of an online medium can impact these perceptions (Thompson & Surface, 2007), but it is unclear if the level of identification or perceived identification further increases the negative perceptions.

Current organizational practices on what is communicated when identified employee opinion surveys are used range from full-disclosure before taking the survey, to simply saying ''the survey is confidential''

or ''we keep your data private,'' to not telling employees anything at all. Data privacy is possible with identified surveys, but anonymity is not—even if it is implied or perceived at some level. Dunnette and Heneman's (1956) distinction between literal anonymity and perceived anonymity is useful for considering employee perceptions of identified surveys. Literal anonymity is not possible with identified surveys. However, the degree of perceived anonymity is not known. The (questionable) practice of collecting and retaining unique identifiers on survey respondents but not telling them masks the level of identification and could lead to levels of perceived anonymity that are more positive than the actual level of anonymity. In addition, some survey implementation techniques (e.g., a unique identifier embedded in a link to survey) can make it difficult for a survey respondent to know if a survey is identified. These practices raise significant ethical and professional practice issues, as is discussed in the subsequent section. Nevertheless, little is known about how employees react to various procedures that can be used to identify survey data and the communication of those procedures. At least in the domain of market research, studies suggest that consumers are not always aware of the degree to which they are identified (Graeff & Harmon, 2002).

Response Behavior

Underlying the concerns about employee perceptions of privacy and anonymity is the belief that they impact participation in employee opinion surveys and response behavior (Sashkin & Prien, 1996; Thompson, Surface, Martin, & Sanders, 2003). Studies from a number of fields have found that when survey participants perceive less anonymity, their survey ratings become more positive, more socially desirable, less honest, and/or of lower quality (Bowling, 2005; Durant et al. 2002; Heerwegh et al. 2005; Rosenfeld, Booth-Kewley, Edwards, & Thomas, 1996; Sashkin & Prien, 1996; Turner et al., 1998), although the size of the impact varies from study to study. These findings are consistent with research on mode of survey delivery, where more personal methods (e.g., face-to-face) are associated with more socially desirable responding (Groves, 2004; Richman, Kiesler, Weisband, & Drasgow, 1999).

Less is known about how response behavior is impacted by the level of identification for an online survey, the communication of the identification practices, the organizational culture, level of trust in the organization, or the various design and implementation features for identifying employee responses (Richman et al., 1999). As Kantor (1991) and researchers in other fields (e.g., Durant et al., 2002) have found, identification primarily impacts responses to more sensitive topics (e.g., rating of immediate supervisor). Research aimed at understanding how all of these factors independently or jointly impact response behavior is clearly needed. In addition, the impact of time and context on these interactions is not well understood. The impact of identification may depend on the organization's and employees' history and experience with surveying. If an organizational survey process establishes itself as trustworthy, then the response behavior may no longer simply be influenced by its level of identification. Over time, there may be or may not be the differences between identified and nonidentified surveys. At this point, there is no research that explores the complex relationships that may exist over time.

Research also suggests that concerns about identification can lead to reduced participation in future surveys (Thompson et al., 2003) and can be a reason for survey nonresponse (Mertler, 2003; Thompson & Surface, 2007). Although these studies seem to suggest that identification may lead to lower response rates, the opposite may also be true. When an employee's survey data are ultimately identified to him or her, even with assurances that his or her data will never be revealed, there may be perceptions of added pressure to take the survey. This is especially the case if

the practice is to remind employees and say either directly or indirectly ''we know you did not respond yet'' (Cook, Heath, & Thompson, 2000). The potential impacts on employee responses when they feel coerced to respond to a survey are not known. Again, more research is needed aimed at examining how survey response is impacted by the level of identification, the communication of the identification practices, the various design and implementation features for identifying employee responses, as well as how organizational culture and trust play a role in these relationships.

Understanding the Impact of Identified Surveys

In addition to empirical research focused on how identification impacts perceptions and behaviors, there is a need for more basic theorizing on the underlying psychological factors that may be operating with an identified survey. The research, to date, has primarily focused on the ''what'' and less on the ''why.'' More research is needed on what the relevant underlying psychological factors are that may be important for understanding the impact of identified surveys and why they are having an effect.

To address these questions, theoretical models from social psychology and communication studies should be useful. The social psychological research on deindividuation is a logical starting point. For example, Spears and colleagues' (Postmes & Spears, 1998; Reicher, Spears, & Postmes, 1995a,b; Spears & Lea, 1994) *social identity model of deindividuation effects* suggests a number of psychological factors that may impact perceptions and behaviors in the context of an identified survey. In particular, this theory focuses on how the social context interacts with the communication medium to impact individual behavior (Postmes, Spears, & Lea, 1998) through the salience of various social identities, self-categorization, and depersonalization. These factors may operate to create more positive perceptions and behaviors as well as more negative perceptions and behaviors. For example, this theory demonstrates how anonymity can lead to low levels of personalization, which allows the individual to cross social boundaries (e.g., respond negatively about one's coworkers or manager), but at the same time, it can create a shared social identity that may make it less likely that those boundaries will be crossed. In addition, the research focusing on these factors within the context of computer-mediated technology and communication (e.g., Joinson, 2001) is likely to provide insights about when and how identified surveys impact perceptions and behavior.

In summary, it is clear that identified surveys can impact employee perceptions and response behaviors. However, it is less clear under what conditions these effects will occur, to what extent they will occur, whether there is greater impact with sensitive questions, and if the effects are any greater than those that may already be created by the use of online surveys. Empirical research and theory development are needed to understand the likely complex relationships among survey identification, perceptions, and response behaviors. There may be conditions that can minimize the potential negative factors (e.g., full disclosure, a high-trust climate, a positive history with surveys) as well as conditions that may exacerbate them (e.g., vague or no information, breach of trust on a previous survey, a manager perceived as retaliatory).

Ethical and Privacy/Regulatory Considerations for Identified Surveys

In this section, we review potential ethical and regulatory considerations for the use of identified employee opinion surveys. The regulations most related to identified surveys are privacy laws.

Ethical Considerations

The use of identified surveys raises several potential ethical concerns, including the need to inform employees and to ensure

data privacy. Even though employee surveys do not require a formal human subjects review (unless they are part of a university project), ethical themes addressed in the area of human subjects reviews are relevant to the use of identified surveys.

The most influential ethical guidelines on human subjects research, and the basis for most human subjects review guidelines, come from the Belmont Report (1979). This report, developed by researchers and ethics experts, covers a wide range of research situations and types of subjects. It states that even when research does not require formal human subjects review, it should follow the principles in the report. Thus, because employee opinion surveys are a form of inquiry and research, their use should follow the principles described in the Belmont Report.

Three general themes from the Belmont Report relevant to employee surveys are:

- *Respect for people* who enter research voluntarily, with adequate information, and without deception.
- *Informed consent*, which includes providing complete information, ensuring comprehension, and voluntariness, and
- *Privacy/confidentiality*, which includes maintaining privacy, data security, and clarifying how long data are retained.

The Belmont Report specifically highlights employees and the need to be cautious with research on employees because of their ''paycheck vulnerability.'' Related to this issue, some proponents of identified surveys have drawn privacy parallels between identified employee surveys and customer surveys, whereby a customer reveals his and her identity or presumably does not worry about privacy issues when responding to a survey (see Antón et al., 2010 or Graeff & Harmon, 2002 for a different perspective on consumers). However, we would argue that there are clear differences in the balance of power for a customer versus for an employee. Customers have the power to not buy from a company, whereas employees are potentially dependent on the company for their livelihood. For employees, the power resides with the employer who can make employment-related decisions; although employees are not powerless, the psychological aspects of responding to an identified survey as an employee versus a customer cannot be assumed to be the same. Employees may perceive greater psychological risk (e.g., repercussions) associated with completing an organizational survey as opposed to a consumer or polling survey (Rogelberg, 2006). Also, simply following the practices of those who conduct customer surveys should be done with caution given the history of market research practices leading to customer privacy backlashes, such as Do Not Call and Do Not Track initiatives.

The Belmont Report also highlights other vulnerable populations beyond employees, including international populations. International populations are defined as vulnerable because laws in other countries may not provide the same level of protection as in the United States and other western countries. The report states that researchers have a professional obligation to protect the rights of international populations regardless of local laws. We are aware of surveys in developing countries that were conducted with possible violations of these principles (e.g., employee national identification numbers attached to a survey without telling the employees).

Privacy Considerations

Related to ethical considerations, the use of identified surveys can raise concerns about the privacy of individually identifiable data. From the perspective of an employee, the concern is that the data be protected from disclosure and used in ways of which the individual is aware and to which he or she would consent. From the perspective of companies and consulting firms, the concern is more complex. There should be, and typically is, a desire by companies and consulting firms to act as good stewards

with sensitive data provided by employees and clients. There is also the need to comply with regulatory obligations for the collection, use, and protection of individually identifiable information as well as mitigate any risk associated with obtaining and using this type of information.

The challenge with meeting these obligations is that data are often collected from around the globe and standards and regulations vary depending on where the data are collected. From an international perspective, there are considerable disparities in data privacy standards and regulations between countries. In some countries, there are little to no standards or regulations concerning the collection, use, and protection of individually identifiable information. In other countries, there are well-articulated and enforced standards and regulations. As well, within the United States the standards and regulations vary depending on the state, the nature of the data, or the circumstances. The strongest of standards and regulations start from the premise that the protection of individually identifiable information is a basic human right (Reynolds, 2010).

For companies and consulting firms collecting employee opinion survey data from multiple countries, the issue becomes this: What are the required and appropriate standards and regulations? Given that many companies and consulting firms are collecting at least some data from citizens of countries in the European Union (EU), the EU's 1998 Directive on Data Protection becomes a relevant set of standards and regulations. This directive sets minimum standards for the protection of individually identifiable information in EU countries. For companies and consulting firms based in the United States, this EU directive becomes operational through the U.S. Department of Commerce's Safe Harbor program (http://www.export.gov/safeharbor/). The U.S. Safe Harbor program has seven data protection principles derived from the EU's directive. These seven principles must be followed by organizations based in the United States that handle employee data from any EU country. On the basis of a small sample survey by Reynolds (2010), these principles are not widely known among the industrial–organizational (I–O) psychology community. Each Safe Harbor principle and its implication for the collection, use, and protection of individually identified information are briefly reviewed below.

The Safe Harbor principle of *notice* requires that information about how the data will be used is provided to survey respondents before the data are collected. This notice should include the uses of the data by the organization and any third-parties that the organization contracts with. As Reynolds (2010) points out, all current and future potential uses of the data are covered by this principle. The implication is that employees should be given accurate notice regarding the fact that the survey will retain identifying information and what this means. Unfortunately, the practice in some organizations is to not tell employees at all, letting them believe the survey is anonymous, or to simply say ''This survey is confidential'' with no further explanation. In addition, the principle of notice implies that an identified survey that was initially described to be used only for one purpose (e.g., to add demographic information) may violate this principle if it is later used for other purposes (e.g., retained for individual-level longitudinal research).

However, as the Safe Harbor principle of *choice* requires, the data can be used for purposes other than those originally described only if survey respondents are asked for permission to include their individually identifiable information in the new uses of the data. This principle gives the provider of the individually identifiable information the opportunity to opt in to the new uses. Given the difficultly of obtaining permission at a later point for new uses of the data, these principles should serve to encourage careful thought about current and potential future uses of individually identifiable information so that employees can be informed, given choice, and permission can be acquired at initial data collection.

Some of the uses of identified survey data may require the transfer of the data from one party to another party. As examples, a survey vendor may transfer data to a statistical expert to help with analyses, or an organization may have a survey vendor transfer individually identifiable data to another consulting firm to conduct linkage research. These types of transfers are permissible under the Safe Harbor principle of *onward transfer* if the transfer is in line with the uses of the data described in the original or subsequent notices and is made to a third party that is Safe Harbor certified. Organizations that may want all possible uses of identified surveys should reference the possibility of the data transfer in the original notice. If it is not referenced in the original notice, the principle of choice should be satisfied before transferring the data.

The fourth Safe Harbor principle, *access,* allows the survey respondent to correct any inaccuracies within reasonable limits or remove his or her data. Of all of the principles, this one carries the greatest degree of ambiguity for identified surveys. For example, individuals would likely be allowed to update inaccurate demographic information but not likely be allowed to change survey responses. This principle may imply that an employee who leaves an organization could request to have his or her survey data removed.

The Safe Harbor principle of *data security* requires that the data be protected from loss, use by unauthorized persons, and disclosure. From a technical perspective, most large organizations and consulting firms have systems in place to protect the security of the data. The technical aspects may be a greater issue for small organizations, small consulting firms, or vendors who use subvendors. Regardless of size, inappropriate use and access are the primary challenges under this principle. The key of this principle is that systems are needed to protect the security of the data from loss and disclosure as well as processes that prevent inappropriate use and access. This principle is additionally backed by possible legal sanctions for data breaches, such as with HIPAA for medical information and the Fair Credit Reporting Act for customer information.

The sixth Safe Harbor principle, *data integrity,* specifies that the data must be accurate, relevant, and used only for the purposes described in the original or subsequent notice. The use of technology to collect, record, and update data goes a long way toward satisfying this principle by minimizing the occurrence of basic errors (e.g., data entry mistakes). Ensuring that those working with and manipulating the data are properly trained and possess the necessary skills also falls under this principle. The last Safe Harbor principle of *enforcement* specifies that there be a process by which individuals can raise a complaint and have it resolved.

As noted by Reynolds (2010), these principles have numerous implications for how individually identifiable data are collected and used. First, clearly articulated policies for the collection, use, and protection of individually identifiable data are needed. The entire process of obtaining, using, and storing this type of data should be thought through before the data are collected. Second, the original notice should clearly define how the data will be used, who will have access to it, and how the individual can correct any inaccuracies. Third, careful thought should be given to current and potential future uses of identified survey data so that these uses can be included in the original notice. Fourth, there is a need to review the organization's data security systems and processes as well as those of any third party by which the data are collected or to which data are transferred.

Given the increasingly global nature of organizations for which I–O psychologists work, privacy standards at the EU-level (and as applied in the United States through Safe Harbor) are likely relevant for most employee opinion surveys. However, even if a survey does not touch countries with strong privacy standards, we would suggest that adhering to strong privacy principles when collecting and using identified

surveys is advisable to ensure responsible stewardship of sensitive data.

Professional Practice Guidelines

We would propose that there are extra responsibilities for survey practitioners who may use identified surveys. This final section includes our recommendations for the use of identified surveys. The ethical standards from human subject research, privacy regulations reviewed above, and professional practice from other areas (e.g., performance management, selection and assessment)—along with our perspectives working with survey consultants and on in-house employee surveys—helped inform these proposed guidelines.

- *Develop policies.* Those using identified surveys should develop clearly articulated policies for the collection, use, and protection of individually identifiable data. These policies, as well as the entire process of obtaining, using, and storing this type of data, should be thought through before the data are collected. Policies should specify who has access to the data and under what conditions the data will be shared with other parties, internal or external to the organization, as well as who can authorize this access.
- *Clearly inform.* Clearly tell employees before they take a survey that they are taking an identified or temporarily identified survey and what this means. Ensure that employees are clearly informed in terms of what is being collected, how it will be used, how their information will be protected, and whether it will be transferred to a third party. Some of this information could be provided on a Web site for more details; we would also recommend that employees be given a contact to answer any questions they may have. These recommendations are related to the concepts of informed consent, adequate information, no deception, and notice.
- *Do not coerce.* Avoid actual or perceived coercion, such as survey reminders that explicitly state it is known that the employee has not responded. A reminder can help improve survey participation (Cook et al., 2000), but it should ideally be sent to all invited employees. Avoiding coercion is related to the concepts of choice, respect for people, and voluntariness.
- *Protect identity.* Always separate the identifying information (e.g., employee number) from the survey data, using nonidentifiable codes and keeping the codes with identifying information in a protected file that is fully separated from the data. This practice allows data to be linked from various sources without using the most sensitive identifiers, such as an employee number. Taking it a step further, those who use data that includes a nonidentifiable code to link the data should be different from those who possess the key that connects individual identifiers to nonidentifiable code. This recommendation is related to the concepts of privacy, confidentiality, security, and onward transfer.
- *Use data responsibly.* Do not identify employees if the questions of interest do not require it. An identified survey should only be used when the research needs require it: for individual-level longitudinal research questions. Only use the data for the original intent and as communicated to the employees when the data was collected and have a policy on data retention and under what circumstances employees can have their survey data removed. Data use and retention relates to the concepts of choice, access, and data integrity.
- *Define duty to warn.* Determine in advance whether circumstances would ever warrant revealing a person's identity, such as if a respondent of an identified survey has entered

a written comment describing a life-threatening situation. This principle also has a legal basis in some states and especially for anyone who may be a licensed psychologist.

We envision these proposed ideas as starting points for discussion. As the profession most aligned with the science and practice of employee opinion surveys, we believe that SIOP should have a point of view and guidelines on the use of identified surveys. SIOP has professional guidelines for other practice areas that use individually identifiable information (e.g., SIOP's *Principals*). It would assist members of our profession to have a set of guidelines to refer to when faced with decision points and ethical dilemmas in their work with employee opinion surveys. The need for principles in general for employee opinion surveys and a ''respondent bill of rights'' has been suggested by others (e.g., Rogelberg & Stanton, 2007).

We would propose that SIOP develop and provide guidelines for identified surveys to assist our members as they make decisions, encounter pressure (e.g., to carry out an identified survey when it is not needed), or face ethical issues with identified surveys. In addition, human resources generalists, non-I–O psychologists, and new vendors across the globe are increasingly working in the area of employee opinion surveys. Surveys are now very easy for almost anyone to conduct with various online survey programs, and some programs allow for uploading the data for all to see who use the site. Other organizations, including ones whose expertise is less aligned to employee surveys than is our profession, have started to offer these types of services.

Given the expanded set of those operating in the area of employee surveys, our profession should take a role as the thought leader to help shape professional practice. Currently little guidance is available, although some other professional associations are beginning to take a lead voice on these issues. APA's Ethical Standards (1992) and Lowman's (2006) *The Ethical Practice of Psychology in Organizations* address confidentiality of data, and there are a few cases on employee surveys. However, neither of these sources addresses specific issues about how identified employee opinion surveys should be conducted, how participants should be informed, and other issues pertaining to data use or possible misuse of identified surveys. In contrast, The Council of American Survey Research Organizations (2011) Code of Standards and Ethics for Survey Research states: ''individual respondents' identity should remain anonymous except in special circumstances and with permission of the respondent.'' Similarly, the American Association for Public Opinion (2010) has ethical guidelines that state: ''In all cases, if survey responses will be linked to identifying information, the respondent should be informed and given the opportunity not to participate in the study.''

We recognize that this article covers a wide range of topics, research, and literature. These were covered to the extent possible to open up a discussion and encourage research on identified surveys. It is our view that if identified surveys are used, professional practices, such as those we have suggested, should be followed to ensure appropriate and adequate information is provided to survey participants, and that there are assurances of data security and clarity of data use. Currently, such professional practice guidelines do not exist for our profession or for employee surveys in general.

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